

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

1. KARI KUYKENDAL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-19-00480-F
	)	(Formerly Oklahoma County
1. LEADER	)	case number CJ-2019-2408)
COMMUNICATIONS, INC.,	)	
	)	
Defendant.	)	

**DEFENDANT’S ANSWER TO PLAINTIFF’S PETITION**

COMES NOW the Defendant, Leader Communications, Inc., (hereafter “Defendant”), by and through its attorneys, McAfee & Taft, and for its Answer to Plaintiff’s Petition, states:

1. Defendant admits the allegations contained in paragraph 1 of the Plaintiff’s Petition based upon information and belief only.

2. Defendant admits the allegations contained in paragraph 2 of the Plaintiff’s Petition.

**CLAIMS AND VENUE**

3. Defendant admits Plaintiff is bringing the claims listed in paragraph 3 of her Petition, but denies Plaintiff is entitled to relief on any claim.

4. Defendant admits the allegations contained in paragraph 4 of the Plaintiff’s Petition.

## **STATEMENT OF FACTS**

5. Defendant admits the allegations contained in paragraph 5 of the Plaintiff's Petition.

6. Defendant admits the allegations contained in paragraph 6 of the Plaintiff's Petition.

7. Defendant is without sufficient information to form a belief as to the truth of the allegations contained in paragraph 7 of the Plaintiff's Petition and therefore denies the same.

8. Defendant denies the allegations contained in paragraph 8 of the Plaintiff's Petition.

9. Defendant denies the allegations contained in paragraph 9 of the Plaintiff's Petition.

10. Defendant is without sufficient information to form a belief as to the truth of the allegations contained in paragraph 10 of the Plaintiff's Petition and therefore denies the same.

11. Defendant denies the allegations contained in paragraph 11 of the Plaintiff's Petition.

12. Defendant denies the allegations contained in paragraph 12 of the Plaintiff's Petition.

13. Defendant denies the allegations contained in paragraph 13 of the Plaintiff's Petition.

14. Defendant denies the allegations contained in paragraph 14 of the Plaintiff's Petition.

15. Defendant denies the allegations contained in paragraph 15 of the Plaintiff's Petition.

16. Defendant denies the allegations contained in paragraph 16 of the Plaintiff's Petition.

17. Defendant denies the allegations contained in paragraph 17 of the Plaintiff's Petition.

18. Defendant is without sufficient information to form a belief as to the truth of the allegations contained in paragraph 18 of the Plaintiff's Petition and therefore denies the same.

19. Defendant denies the allegations contained in paragraph 19 of the Plaintiff's Petition.

20. Defendant denies the allegations contained in paragraph 20 of the Plaintiff's Petition.

21. Plaintiff's Petition fails to state a claim upon which relief can be granted.

22. Defendant did not discriminate or retaliate against Plaintiff on any illegal basis.

23. All employment actions relating to Plaintiff were taken for legitimate nondiscriminatory reasons.

24. Plaintiff has not suffered the damages alleged in her Petition.

25. On belief of Counsel, Plaintiff has failed to mitigate her damages, if any.

26. The actions of Defendant do not warrant the imposition of punitive damages.

27. Any challenged actions were lawful, were privileged or justified, were not done for the purpose of causing injury, and were not motivated by malice, ill-will or malice at law.

28. All challenged actions were made in good faith and were reasonable.

29. Plaintiff is not entitled to the relief requested, whether legal or equitable in nature, in her Petition.

WHEREFORE, having fully answered the Petition, Defendant Leader Communications, Inc. prays that the claims against it be dismissed, for an award of attorneys' fees, costs and expenses incurred herein, and for such other and further relief this Court deems just and proper.

Respectfully submitted,

/s/ Nathan L. Whatley

Nathan L. Whatley, OBA # 14601

MCAFEE & TAFT

10th Floor, Two Leadership Square

211 North Robinson

Oklahoma City, OK 73102-7103

(405) 235-9621

(405) 235-0439 Fax

[nathan.whatley@mcafeetaft.com](mailto:nathan.whatley@mcafeetaft.com)

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 4<sup>th</sup> day of June, 2019, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Leah M. Roper, OBA #32107  
D. Colby Addison, OBA #32718  
LAIRD HAMMONS LAIRD, PLLC  
1332 SW 89<sup>th</sup> Street  
Oklahoma City, OK 73159  
E-mail: colby@lhllaw.com  
leah@lhllaw.com

**ATTORNEYS FOR PLAINTIFF**

/s/ Nathan L. Whatley

Nathan L. Whatley